

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

THE COLEMAN COMPANY, INC.,

Plaintiff/Counterclaim Defendant,

v.

TEAM WORLDWIDE CORPORATION,

Defendant/Counterclaim Plaintiff.

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Civil Action No. 2:20-cv-351-RGD

JURY TRIAL DEMANDED

**DECLARATION OF CHENG-CHUNG (“TONY”) WANG IN SUPPORT OF TEAM
WORLDWIDE CORPORATION’S MOTION FOR LEAVE TO AMEND ANSWER AND
TO JOIN A NECESSARY PARTY**

I, Cheng-Chung Wang, hereby declare:

1. I am employed by Team Worldwide Corporation (“TWW”) as Chairman and I am also the founder of the company.

2. TWW is based in Taipei, Taiwan and operates a factory in mainland China (the People’s Republic of China).

3. On August 29, 2002, my attorneys filed a patent application with the U.S. Patent and Trademark Office that led to the issuance of U.S. Patent No. 6,754,926 (“the ’926 Patent”), entitled “Inflatable Bed,” on June 29, 2004.

4. At the time of this application and since then, my and TWW’s policy was that I would assign all of my patents to TWW.

5. To my knowledge, all of my patents are assigned to TWW.

6. My understanding was that the application leading to the ’926 Patent was assigned to TWW at least by the time of the patent application in 2002.

7. It was also my understanding that TWW, as the owner by assignment, had all rights to the '926 Patent.

8. Neither TWW nor I have licensed the '926 Patent to any entity.

9. Despite an exhaustive search of TWW's records, the document assigning the '926 Patent to TWW could not be located.

10. I consent to being added as a co-counter plaintiff with TWW in the litigation entitled *The Coleman Company, Inc. v. Team Worldwide Corporation*, Civil Action No. 2:20-cv-351-RGD, in the U.S. District Court for the Eastern District of Virginia.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 27, 2021

/s/ 
Cheng-Chung Wang